

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

CYNTHIA ALLEN,

Plaintiffs,

v.

AT&T MOBILITY SERVICES LLC a/k/a  
AT&T MOBILITY LLC,

Defendants.

Civil No. 1:18-cv-3730-WMR

**ORDER GRANTING AMENDED JOINT PRELIMINARY  
REPORT AND DISCOVERY PLAN**

The parties filed their Joint Preliminary Report and Discovery Plan with this Court on March 21, 2019 [Doc 34] and the Amended Joint Preliminary Report and Discovery Plan on May 17, 2019 [Doc 45].

The Court hereby denies as moot the original Joint Preliminary Report and Discovery Plan [Doc 34] and GRANTS the Amended Joint Preliminary Report and Discovery Plan [Doc 45] by entering the following deadlines:

In light of the complexities of this case, the parties request for a discovery period of six (6) months for non-expert fact discovery before undertaking class certification briefing and expert discovery is granted. If the parties anticipate that additional time beyond that allowed by the assigned discovery track will be needed to complete discovery or that discovery should be conducted in phases or be limited to or focused upon particular issues, those are detailed below:

<b>Event</b>	<b>Deadline/Date</b>
File Joint Preliminary Statement & Discovery Plan	On or before March 21, 2019
File Stipulated Proposed Protective Order	April 1, 2019
File Stipulated Proposed ESI Protocol	April 1, 2019
Fact discovery commences: Depositions shall proceed concurrently with no party having priority.	March 21, 2019
Parties meet and confer regarding structured databases, custodians, search terms, and a production protocol	To begin within 14 days of delivery of service of RFPs

Substantial completion of production of structured databases (HR, attendance, etc.)	July 16, 2019
Rolling production of documents in response to requests for production shall begin	May 20, 2019, but no sooner than required by the Federal Rules of Civil Procedure.
Add any additional parties and/or amend pleadings	June 14, 2019
Privilege logs shall be provided on a rolling basis	Beginning June 24, 2019
Substantial completion of document discovery	September 27, 2019
All privilege logs associated with documents produced by substantial completion deadline shall be produced	No later than October 16, 2019
Fact discovery ends	November 29, 2019
Plaintiff's motion for class certification & disclosure of experts and opinions on which she relies in her motion	January 17, 2020
Completion of deposition of Plaintiff's expert(s)	No later than February 18, 2020
Defendant's response to class certification motion & disclosure of experts and opinions on which it relies in its response	March 30, 2020
Completion of deposition of Defendant's expert(s)	No later than April 29, 2020
Plaintiff's reply in support of class certification & disclosure of experts and opinions on which she relies in her reply	May 29, 2020
Parties meet and confer to develop proposed scheduling order and discovery plan for the remainder of the proceedings	Within 10 days of the court's ruling on Plaintiff's motion for class certification

IT IS SO ORDERED, this 22nd day of May, 2019.



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The Honorable William M. Ray, II,  
UNITED STATES DISTRICT JUDGE